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# **Framing the Debate and Taking Positions on Food Allergen Legislation: The 100 Chefs Incident on Social Media**

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**Short title: Framing the Debate and Taking Positions on Food Allergen Legislation**

**Abstract**

Those suffering with food allergies and intolerances need to consider risk every day, and professional organisations are increasingly enrolled in this risk management venture (e.g. offering support, developing legislation, and enforcing laws). Following the release of new food allergen rules in the UK, the Daily Telegraph, a national broadsheet newspaper published a letter and an article in March 2015 endorsed by 100 chefs criticising the legislation. The chefs felt that innovation and creativity were being harmed by the requirement to state the presence of 14 allergens in the dishes they cooked. Following the release, many food allergen-concerned consumers utilised social media to share their views. In this article we use qualitative research data, comments posted online and collected between 9 and 16 March 2015, to explore how claimants positioned themselves and others in the ensuing online debate, and how the debate itself was framed. The data included traditional news articles, online forum comments, individual Twitter posts, and Twitter discussions. We identified frames across the debate discourse that emphasised medical concerns around managing risks associated with food allergy/intolerance, the assignment of responsibility, fairness of access, the political nature of the debate, and the financial implications involved. We draw on Positioning Theory to illustrate how user-positions can be defined, redefined, and challenged in the light of new or varying information. Our findings have implications for understanding communication around managing food risks from both a consumer and business perspective, and understanding the progression of debates through both traditional and new media platforms.

**Keywords:** risk, food allergy, food intolerance, framing, Positioning Theory, social media.

## **Introduction**

In this article we examine the ways in which the risks associated with food allergies and intolerances are framed in both social and traditional media. We use an online debate that was stimulated by a news article published in the Daily Telegraph on Monday 9 March 2015 voicing the concerns of 100 chefs about new Food Information Regulations requiring them to report of the presence of allergens in the dishes they served. The chefs felt the regulations would hurt their businesses and constrain their innovation in the kitchen. In this article we aim to identify the frames deployed in the debate and within this, to identify the ways in which these frames are drawn upon by individuals to (re)position and (re)present themselves in relation to the enterprise of managing the risks of food allergy or intolerance.

## **Risk, Food Allergies and the Media**

Managing risk in the context of food allergy and food intolerance is a social enterprise (Nettleton, Woods, Burrows, & Kerr 2009). As well as the individuals and their immediate social networks a range of organisations are enrolled in risk management. These range from support and advocacy groups, through to businesses concerned with food safety, information provision, food labelling and training. The emergence of these organisational interests and responsibilities is in part a response to the focus of policy attention on managing risk in this area (Elliot, Fenton, Sinn & Clarke, 2015; Harrington et al 2012). Food allergy is increasingly framed as a risk and public health issue and hence policy actors provide advice, resources and support to individuals, food businesses as well as developing and enforcing legislation. Notably, in 2014 new legislation was introduced requiring businesses to provide information about particular allergens in food they were providing (see Food Standards Agency, 2013).

### ***Food Allergy and Food Intolerance***

Although the terms food allergy and food intolerance are often used interchangeably, in medical terms they are separate conditions. Food intolerance describes repeatable adverse reactions to foods that most people would not react to and that do not involve the immune system. It is difficult to diagnose because of a lack of biomarkers. Non-allergic reactions to food may be attributable to a variety of mechanisms, some known and some unknown, including enzyme defects (such as lactose intolerance) and the autoimmune disorder coeliac disease. Symptoms of food intolerance most commonly affect the skin or gut, and usually occur some hours following ingestion of the food. Symptoms can range from mild/moderate (colic, reflux, bloating, and constipation) to severe (severe persistent vomiting or diarrhoea, significant blood in stool, faltering growth). Adverse reactions are only described as allergic if they are caused by mediated reaction to immunoglobulin E, an antibody that triggers food allergy symptoms, which can be confirmed by clinical tests. Food allergy usually presents as a rash or swelling very rapidly after eating; in its most severe form, known as anaphylaxis, the reaction can cause breathing difficulties, a sudden drop in blood pressure, and on rare occasions is fatal. There is no cure for food allergy; avoidance of the offending allergen(s) is central to managing the condition; anaphylaxis is treated through the administration of adrenalin.

Eating outside the home presents significant challenges for those who are vulnerable and seek to avoid allergens. A systematic review of 24 studies observed that 21-31% of accidental allergen exposure and reactions occurred in restaurants, with 13-23% occurring in the school or work setting (Versluis et al., 2015) and eating out has been implicated in half the deaths related to food allergen consumption (Pumphrey & Gowland, 2007). More commonly however the impact of having food allergy or intolerance is on quality of life (Gupta et al., 2008). In part this is linked to the stigmatisation that can be occasioned by ‘going public’ about having an allergy or intolerance when eating out; by making claims as part of the eating out

experience about needing to avoid particular allergens. In the eating out context not only is the risk of a reaction the greatest, it is here that the identity of an allergic individual is most salient (Barnett & Vasileiou, 2014). A study exploring the experiences of nut-allergic consumers highlighted how the process of checking if available food choices contained nuts was a source of embarrassment for many; the desire to avoid such embarrassment could result in increased risk taking (Leftwich et al., 2011). Begen et al. (2016) found a sense of reluctance and embarrassment when making enquiries of staff around a broader range of allergens, and that avoiding the need to draw attention to oneself was one of the reasons why consumers preferred written information about allergens. Guidance on the management of childhood anaphylaxis has highlighted peer pressure, embarrassment, stigma, choice, and spontaneity as factors that can lead to make risky venue or food selections (Muraro et al., 2014, Peniamina, Miroso, Bremer, & Conner, 2016). Being ascribed the label of a fussy or picky eater challenges the legitimacy of an allergic/intolerant individual's claims (Barnett & Vasileiou, 2014).

The eating out landscape changed when in December 2014 new EU legislation was introduced, incorporated in UK law by the Food Information Regulations (Food Standards Agency, 2013), which required food retailers to provide customers with ingredients information relating to 14 food allergens: celery, cereals containing gluten, crustaceans, eggs, fish, lupin, milk, molluscs, mustard, tree nuts, peanuts, sesame, soya, and sulphur dioxide. The regulations specify that this information should be provided for both packaged and non-prepacked food, including food served in restaurants, cafes, take out facilities and other places where food is served such as schools, nurseries, hospitals, and airlines. Eating out establishments have discretion over how this information is provided to consumers; it could be through written information on signs, menus, or passed on through staff.

On Monday 9 March 2015 the Telegraph newspaper published an article that voiced the concerns of 100 chefs in relation to these new food allergen rules (Dominiczak, 2015).

The article, under the headline, ‘Top chefs attack EU rules on allergens in food’ reported a letter that these chefs had written to the newspaper (Leith et al., 2015) stating that they felt their ‘spontaneity, creativity and innovation’ were being constrained by the requirement to state the presence of 14 allergens in the dishes they cooked. Following the release of this article consumers (many writing as individuals with a food allergy or intolerance) took to various internet fora to voice their views on the topic. Contributors provided lengthy comments beneath the online version of the Telegraph article, others took to Twitter to present their views; creating their own hashtags to support focused attention and conversation on the subject (such as #100CluelessChefs and #100Chefs).

This coverage provides an opportunity to consider the way in which the requirements of the legislation were discussed on social media and how the enterprise of managing allergy was related to that of managing risk. In this article we examine how the discussions were framed and the ways in which contributors positioned themselves and others within these frames.

### ***Risk and Social Media***

The media play a key role in relation to shaping people’s frames of reference around risk (Fuentes & Fuentes, 2015) and are a resource that are drawn upon in the accomplishment of everyday food practices (Keller & Halkier, 2014) though the processes through which, and the extent to which, media influence or reflect public views continues to be a matter of debate. This is particularly the case given the dramatic changes in the media landscape over the last decade with the rise of Web 2.0 and the proliferation of social media and other forms of user-generated content. The terms of the debate have changed with an exponential rise in the platforms that enable citizens and stakeholders to be part of creating and shaping food-related news (Chew & Eysenbach, 2010).

Certainly the media have long been central to considerations of how individuals, groups and organisations make sense of and manage risk but though the internet and the rise of social media may have ‘transformed the conceptual framework in which people interpret, perceive, and respond to risks’ (Chung 2011, p.3), Lupton (2016) suggests that thus far little attention has been paid to social media and its role in communicating and understanding risk. Early work has considered the comments following online news reports (Regan et al., 2014; Rowe, Hawkes & Houghton, 2008) and Twitter (Binder, 2012; Fellenor et al., 2017; Gaspar et al., 2014).

The evolution of smartphone apps and mobile data availability has enabled social media to become increasingly important to the way in which people search for and consume information online (Dutton & Blank, 2013). It is clear that there are greater possibilities for both stakeholders and the public in playing a significant and visible role in the proliferation of information via social media (Fellenor et al., 2017). Social media platforms give access to an array of information quickly and in real-time, often acting as a key venue where information is sought, and questions are asked and answered (Duggan, Lenhart, Lampe, & Ellison, 2015).

Many food allergic and intolerant individuals employ online sources when managing food related risks (e.g. searching appropriate restaurants, menus and dishes, or ingredients lists of products, and reviews; Begen et al., 2016). Food allergic individuals may lead discussions around food allergy, and related policy (Harrington et al., 2012). There are a range of networks and communities active on social media relating to food allergy and intolerance. In addition to the Food Standards Agency, support organisations (including Allergy UK, Anaphylaxis Campaign, Coeliac UK) utilise social media to help support people with food allergies and intolerances. Groups of like-minded food allergen-concerned Twitter users communicate alongside these more corporate Twitter accounts (e.g. a weekly Twitter discussion group brings together Twitter users interested in food allergen related topics linked through the hashtag



#AllergyHour). Individual medical allergy specialists, free-from businesses and allergy catering training companies also regularly tweet about allergy related matters.

Although cues relating to the identity of information sources via social media online may sometimes be limited, engaging on social media platforms can stimulate a sense of social identity or shared group membership amongst their users (Flanagin, Hocevar, & Samahito, 2013), which can enhance motivation to engage and contribute. Group identity has been found to motivate information sharing in online contexts, especially where information is perceived as being of worth to those with similar views (as with online ratings systems; Ling et al., 2005). Furthermore, users perceive information shared by those similar to themselves as more trustworthy and consequently indicate that they would be more likely to act upon the given information (Flanagin et al., 2013). In fact, engagement with online forums around a topic has been seen to improve user well-being as well as promote an individual's involvement in civic activities (Pendry & Salvatore, 2015).

### ***Framing and the Media***

Inevitably sources of information available to an audience will be coming from a specific context, angle or affiliation; the information available to us will be framed. Hertog and McLeod (2001) emphasise how analysis of frames/framing has taken a place of prominence in social and political science and media studies. Goffman's (1974) original work *Frame Analysis* noted that in order to make sense of our life experiences we actively categorise, organise, and interpret them. Thus frames are described as schemata of interpretation, and a core organising idea that provides meaning for events or information (Gamson & Modigliani, 1989; Goffman, 1974). Gitlin (1980) describes frames as the continual selection, emphasis, and exclusion of information such that it functions to define problems, assess cause, make judgements and consider solutions (Entman, 1993). Sources of information demonstrate a

structure of organised representations, which allude to the backing of certain ideas and encourage ways information sources might be processed by an audience and possibly reused in later discourse/debate (Pan & Kosicki, 1993). Much framing research has focussed on the frames that emerge in political communications and news media coverage though these are also exemplified in day-to-day conversation and interaction (Hertog & McLeod, 2001). The rise of social media thus offers the opportunity to consider how frames employed in traditional media are appropriated, developed, and challenged or replaced in talk online. The concept of positioning provides a useful conceptual scaffolding for doing this. We will consider this in relation to food allergy and intolerance.

Most of the time there are no visible markers of having a food allergy or intolerance. One situation in which they become ‘socially visible’ is when claims of being food allergic or intolerant are made in the process of seeking to manage the risk of consuming food containing the allergen, for example when eating out. In this situation, others are enrolled in the process of risk management. However, food allergic or intolerant consumers report that publicly seeking to ascertain the presence of allergens by asking staff about such issues as the ingredients in a dish, runs the risk of being attributed with an allergic or intolerant identity associated with unwanted attention and feelings of stigmatisation (Begen et al., 2016; Leftwich et al., 2011). Claims and attributions of identity are thus inextricably interwoven with the responsibility of eating out venues to provide information about allergy and the interaction around checking and clarification that may accompany this.

One approach that facilitates consideration of the use of frames in relation to an individual’s identity or role in specific contexts is Positioning Theory (Harré, Moghaddam, Cairnie, Rothbart, & Sabat, 2009). This theory seems highly appropriate when considering the multiple claimants, platforms, and topics that are present and take place during online debates and in shedding light on how frames are differentially appropriated in line with identity.

Positioning Theory is concerned with social episodes, one's rights and duties, and the significance of actions (Harré et al., 2009). Story-lines play an important role here; they allow claimants to position themselves within a specific social episode (Harré & Moghaddam, 2011) and can be seen in online interactions such as when explaining one's experience or expertise during an online discussion. There is some precedent for exploring the use of positioning in the context of social media discourse. One example, from Tirado and Galvez (2007), used the concept to explore discourse taking place during university internet forums, where the act of positioning oneself and others was based on discussions of commitment or non-commitment to a cause. Positioning oneself (reflective positioning), positioning others (interactive positioning), taking up a position constructed by others, or challenging their positions may serve the purpose of defining oneself as different from other groups (Harré & Moghaddam, 2011).

## **Methods**

The new media environment, where citizens are producers of media content, provides an important opportunity to explore how audiences online engage with traditional media (O'Connor & Joffe, 2014). We will do so in the context of the online debate that ensued after the 100 chefs wrote to the Daily Telegraph to complain that the Food Information Regulations requiring them to report whether any of the 14 allergens were in the dishes they served would hurt their businesses and constrain their innovation. In order to capture initial reactions, we analysed the article that first reported the letter from the 100 chefs and the comments that followed this. Two further articles were selected as they provided an opportunity to include the perspectives of individuals caring for children with allergies/intolerances, and living with an allergy/intolerance themselves. Data from Twitter was captured as it is widely considered to be aligned closely to newsworthy events in real time (Petrovic et al., 2013) and to traditional

media reporting (Farhi, 2009), as well as being a forum for debate and expressing opinion (Whiting & Williams, 2013).

### ***Data Collection***

In order to explore the frames for the debate about the 100 chefs incident and the positions that were taken across traditional and social media, we used three articles in traditional media, the comments section from the original source article, and Twitter data collected using two different approaches. All data were collected between 9 and 16 March 2015.

***The Original Article.*** The original news article was from the Telegraph reporting the release of the letter from the 100 chefs, which voiced 100 professional chefs' concerns about the allergen legislation and the potential damage on the catering industry (Dominiczak, 9<sup>th</sup> March, 2015). The article itself gave some basic background to the allergen laws and outlined some of the reasons the chefs feel the legislation would harm UK businesses (e.g. by quoting some of the chefs who had signed the letter). The article put a strong emphasis on the allergen legislation being regulated through the EU.

***Article 2.*** A subsequent news report, again from the Telegraph, written from the perspective of a parent of children with coeliac disease (Lambert, 12<sup>th</sup> March, 2015). This article was written in the format of a letter to Jamie Oliver (seen here as a supporter of allergen-free cooking), and asked him to set an example to the anti-legislation 100 chefs. The letter also presented examples of both positive and negative eating out experiences.

***Article 3*** A final third news article downloaded from the Guardian newspaper, which explored why chefs were 'cooking up such a fuss on allergy labelling', and why the legislation was needed (Smith, 16<sup>th</sup> March, 2015). The article suggested that so-called top chefs should be leading the way in making it easier for everyone to enjoy eating out, and that implementing the rules should not prove too challenging for experienced chefs.

***Comments on the original article.*** The user comments following the online version of the original 100 chefs news article in the Telegraph (see Dominiczak, 2015) were downloaded and regularly checked for additional posts until commentary ceased. In total, there were 63 comments.

***Tweets.*** Using a Twitter data collection tool (Chorus Analytics: Brooker, Barnett, & Cribbin, 2016) we collected tweets using two different approaches. Firstly, we accessed tweets utilising hashtags relating to the food allergen legislation and 100 chefs incident:

- the hashtag created by the Food Standards Agency to spread the word of the new regulations, #14Allergens (127 tweets in total),
- the weekly Twitter allergy discussion group #AllergyHour (228 tweets),
- #100chefs (73 tweets) and #100cluelesschefs (16 tweets) – both hashtags created by Twitter users to promote discussion around the 100 chefs incident.

We also accessed tweets from a sample of food-allergen concerned users identified through descriptions in their Twitter biographies, providing 111 tweets from 75 individual accounts. We anticipated that these users would be discussing the 100 chefs incident within their networks, but might not have used hashtags for tweet-capture that would have been accessed via the keyword search method.

We exported tweets into spreadsheets containing post date/time, username, and tweets for analysis. Figure 1 highlights the timeline of the 100 chefs debate. We can see the appearance of each news article included in the analysis, as well as the arrival and longevity of the comments on the original news online platform and of Twitter coverage relating to specific hashtags.

[Figure 1 near here]

### ***Analytic Method***

We used an inductive qualitative approach to identify frames within the debate discourse. Using a sequential process of coding and theme-development for each data source we sought to identify frames within the data and the positions taken on each of the frames. We were attuned to consider both the timing (which day) and the nature of the data (which source/platform). In identifying frames and positions we looked for symbolic devices such as patterns, biases, ideologies and emphasis (Gamson & Modigliani, 1989; Hertog & McLeod, 2001; Streeter, 2009). We adopted an analytic approach in line with traditional thematic analysis including familiarisation, coding, defining and redefining (Braun & Clarke, 2013).

### ***Ethical Considerations***

We used the British Psychological Society (BPS) guidelines for implementing internet-mediated research (BPS, 2013). Due to the open access and public nature of the online news article and Twitter platforms, we could not obtain informed consent from any of the users quoted in this report. Twitter, as a company, specifically provides data for the purposes of research; no terms and conditions were broken by not requesting the consent of users whose Twitter posts have been reported in the analysis. We maintained the anonymity of users by not referencing their specific username, full name, affiliation or geo-location. Furthermore, to prevent traceability of tweets and in line with BPS (2013) recommendations, we have paraphrased the quotes. Ethical approval was granted for this research by the Department of Psychology Ethics Committee at the University of Bath (reference number: 15-088).

### ***Reflections and Delimitation***

Throughout the research process we have been aware of our own experiences, and how these may affect the way we see certain aspects of the collected data. Richard Hamshaw's

mother has been diagnosed with coeliac disease for over a decade and it is likely that his experience of eating out with her and his family may have affected the perspectives and views he sees as most important in this research. Furthermore, given that funding for this project was provided by the Food Standards Agency and the Asthma, Allergy and Inflammation Research Charity as researchers we are particularly aware of the issues facing individuals seeking to manage food allergy and intolerance.

Since social media acts as a complementary information network for individuals who consider being well-informed as highly important (Kuttschreuter et al., 2014), it is not unreasonable to assume that Twitter provides access to some of the most engaged and active information seeking individuals. Typical viewpoints may not be seen here, and it is important to be aware that the online media and social media users contributing to this debate may not reflect the stance of all of those seeking to avoid allergens in their food choices when eating out.

## **Findings**

We identified five frames. These related to medicalisation, responsibility, fairness of access, the politics of Europe, and financial implications. An overview of these frames can be seen in the matrix produced during analysis (see Appendix). We present each of these frames in turn and we consider how people position themselves in respect to each of these.

### ***Medicalisation***

One key frame utilised during the 100 chefs incident emphasised the medical nature of food allergy and intolerance and coeliac disease. For most of the individuals commenting on the 100 chef episode, it was the main justification for the allergen legislation; ultimately the

reason it was introduced was to protect people from harm. In this frame there was a clear link between labelling food and managing the medical risk of allergic reactions.

Although the original 100 chefs article in the Daily Telegraph did not refer to medical issues, both the follow-up articles, Articles 2 and 3, highlighted coeliac disease as an important and real illness. However, none of the news articles highlighted the severe consequences of anaphylaxis, which may seem strange considering that referencing a potential life-saving aspect of the legislation may have prompted others to take the issue more seriously. Users in their online posting following the first Telegraph online article did develop the medical frame in the following ways:

When a diner says they have an allergy that means their body's immune system attacks allergens they're allergic to ... this is something that needs to be taken seriously.

So it's okay if I become unwell because of some poorly informed chefs...

Bearing in mind that consuming something you're allergic to can cause anaphylaxis in some cases I'm surprised something like this hasn't been implemented before.

In addition, online commentators used the example of anaphylaxis to support the need for the legislation; some suggested that if chefs had experience with anaphylactic episodes they would be more likely to take the rules seriously. For example Twitter commentators posted the following tweets:

To see the seriousness of this I wish they'd witnessed a full-blown ana reaction  
#AllergyHour.

If you killed a customer do you think you'd still see the law as excessive? #foodallergy  
#100chefs #foodsafety



So sorry to inconvenience you with our health issues!

There was a time when I'd have sympathy for chefs here until boss died of anaphylactic shock, lives more important #14Allergens

These social media users used claims about the seriousness of medical reactions to position chefs as not taking the medical implications of an allergic reaction into account. By associating their allergy or intolerance with a medical diagnosis or classification, the claimants highlighted the importance and legitimacy of their illness, as well as endorsing the necessity of the legislation itself. However, some social media users who opposed the allergen legislation sought to re-position intolerant individuals as being fussy or picky, undermining their medicalisation claims:

The issue is many people hide behind so-called allergy because they just don't like some ingredients ... the only people who need gluten free food are people who suffer from coeliac disease (Commenter in original article).

It's the frauds that create this hate (#AllergyHour commenter)

Many of the social media users who commented on the original news article identified themselves with a medical or diagnostic term to emphasise their particular interest and expertise in the issue, for example:

As someone with coeliac disease I would much prefer written info

Having a food intolerance makes eating out so tricky in the UK

As a mum of 2 children with multiple allergies it makes me sad to read this article

However, individuals posting on Twitter did not provide the same identification, perhaps due to the limited character space afforded by the platform; though they often referred to their allergy or intolerance in their bio/profile description. Furthermore, participation in specific allergen-related hashtag discussions, such as #AllergyHour, was likely to signify a participant's position as an allergen-concerned Twitter user.

When participants identified themselves as having a medical allergic or intolerant identity and used the medical frame in this context, it functioned as a 'bottom-line' resource (Shepherd et al. 2007) effectively closing down the options for a contrary comment. Such a comment would be denying the reality of medical condition and therefore be self-evidently misconceived and hostile.

### ***Responsibility***

Those using social media also used a second frame based on the concept of responsibility. This frame was ambiguous as it could position either consumers or producers of food as being responsible for managing the risks of allergens.

Sometimes the responsibility frame was deployed to argue that responsibility should lie with the food allergic/intolerant individual when eating out in a restaurant or food venue, for example by asking and checking about allergens in food before ordering, or ahead of time and being, as one #AllergyHour claimant contended, 'clued up'. Others claimed the responsibility of the consumer through highlighting the costs and administration time involved in meeting the expectations of the regulations for eating out venues through the provision of written

information. The allergic or intolerant individual was thus positioned as the active agents in this frame, emphasising that they were the ones making life difficult for chefs:

It is a total fiasco and in my view is the responsibility of the allerger to ask, not the restaurateurs to list. (chef Thomasina Miers, quoted in the original article)

One commenter on the original article positioned themselves as an allergic person who recognised their responsibility but that this could not be exercised unless those providing the food took their responsibility

Unquestionably, overall it is up to me to ask about allergens, but there's no point asking if I can't be given a clear answer

Other claimants also highlighted the need for both consumer and business to both take responsibility

by all means make it the responsibility of the consumer to ask, but it should also be the restaurant's responsibility to provide a list of allergen info with these requests (Commenter on the original article)

Consumers need to give info and businesses need to care enough to find out for them! (#AllergyHour commenter)

There were some posts that drew on both the responsibility frame and the medical frame by questioning whether someone with a serious allergy should be eating out at all – suggesting this was irresponsible:

People with serious life-threatening allergies, in my view, should not be eating out at all (Commenter on the original article)

However most posters felt that the main responsibility for risk management lay with food businesses and suppliers not vulnerable consumers. They wrote that not only should food venues, chefs and managers take responsibility to provide allergen menu information, but also those that supported food venues and the public bodies should limit risk by enforcing/checking up on food providers:

It's not just chefs that need to be looking for allergen information, it's also a supplier's duty of care to pass the information on from their manufacturers (Commenter on the original article)

These posters stressed that those who are providing a service to paying customers should be responsible in providing all information regarding allergen in dishes; so consumers could make informed decisions. One commenter on the initial article who had thanked a restaurant for providing allergy information in a simple and straight forward way reported their response in the following way:

A restaurant manager returned my thanks and gratitude by saying 'It's not rocket science!'

These two approaches to responsibility, consumer versus provider, fit with the concepts of rights and duties outlined by Positioning Theory (see Harré & Moghaddam, 2011). On each side of the argument, claimants attempted to position themselves as having certain rights/duties during this debate, and at the same time challenge the rights/duties of opposing-claimants. For example, one allergic individual claimed the right to disregard a chef's standpoint given the incompetence evidenced by misspelling (or mistyping) coeliac (as celiac) indicting a lack of understanding of the disease and therefore right to make claims:

You claim you're a chef, but I am deeply concerned you think it is celeriac disease! Celeriac is a vegetable! "Coeliac disease" is actually an auto-immune disease (Commenter on the original article).

Similarly, chefs positioned themselves as having the right to be creative and spontaneous in their kitchen, but such privileges were challenged by posters who claimed that they did not have real knowledge of food and ingredients if they could not provide information on the allergic potential of some ingredients:

These regulations don't stifle creativity. All chefs should know what ingredients go into their food, the regulations are only asking for a slightly deeper level of understanding, and to make this information available (Commenter on the original article).

Thus, posters who claimed chefs should take responsibility for risk management, challenged their perceived incapability to adapt to allergen-free cooking, and a perceived inability to understand the regulations fully as the following two commenters on the original article posted:

These 'TOP' chefs surely know their ingredients!

A bit disappointed with these 'top chefs'. Creativity can come from unexpected challenges, they could look at allergy-free cooking as a chance to explore new recipes

The critical nature of most of the posting was embodied in the creation and use of the #100CluelessChefs hashtag that positioned chefs as lacking expertise and knowledge to understand and work within the new allergen rules. At the same time, many of the allergic/intolerant claimants positioned chefs or food businesses as essentially uncooperative and irresponsible as they were 'refusing the assignment of duty' the legislation gave (Harré et al., 2009, p.9).

### *Fairness of access*

Another, albeit less dominant frame was the issue of fairness and access with eating out. Several claimants expressed the view that food venues should be as safe as possible so those with food allergies or intolerances had fair access to eating out. Those posters who utilised this frame stated that food allergic/intolerant diners should feel they could eat out in the same way as non-allergic/intolerant customers. These posters emphasised that fair access could be achieved if businesses were willing to put in some time to audit and adapt some of their dishes. In her article in the Guardian (Article 3), Liz Smith suggested that some of these top chefs: ‘should be leading the way in making it easier for everyone to enjoy good food.’ Those using this frame wrote that allergic and intolerant consumers should not be made to feel any different to other diners. They should be able to eat out like everyone else, or at least know what they could/could not eat, at any venue they visited. When writing to Jamie Oliver in her article in the Daily Telegraph (Article 2), Claire Campbell-Adams stated,

I don’t expect you to change every dish on the menu; that wouldn’t be fair on everyone else. But children, especially, with coeliac [disease], have a rough time being different. Couldn’t you help them fit in a little?

One participant in the #AllergyHour discussion stated that chefs needed to ‘treat all cases seriously; it’s not their job to judge’. Individuals who posted and who indicated they had food allergies or intolerances utilised this frame to position themselves as consumers who have the same rights as other diners. They claimed that restaurants has a duty of care to enable everyone, whether or not they had allergies or intolerances to eat safely. However, there were individuals who took the opposite position claiming that fairness or all-exclusiveness was unrealistic and that people with allergies should accept that they could not eat in some restaurants, as one commenter on the original article wrote:

We know there would be cries of ‘that’s a breach of my human rights’, if we were to just say don’t eat at this restaurant if you’re allergic

### ***The politics of Europe***

The original 100 chefs’ letter and the article in the Guardian foregrounded EU legislation as a political issue. Their headlines of ‘EU is cooking up a nightmare for restaurateurs’ and ‘Top chefs attack EU rules on allergens in food’ highlighted European Union legislation obscuring the risk management focus that is inherent in the medicalisation and the responsibility frames. Some of those posting comments claimed that the legislation was an unnecessary European push for power, and that the European Union should not be imposing regulations on UK businesses. For example, in the original Daily Telegraph article Matthew Elliot from the campaign group Business for Britain was quoted as saying that the legislation was an ‘overreaction from Brussels using a regulatory sledgehammer’; a view endorsed in the following tweet:

Today, I’ve been eating creative British food, which hasn’t conformed to any nice safe EU clap-trap! #14Allergens #100Chefs

Some posters framed the EU positively, arguing that EU level allergen legislation provided the benefits of having multiple countries following the same rules and of the UK adopting the standards of other EU countries, as commentators on the original Daily Telegraph article noted:

The regs are there to help the millions across all of Europe suffering from food allergies

On a previous trip to France EVERY waiter or waitress I came across knew what Coeliac disease was and what I could eat. None of these restaurants were highbrow/expensive. I’ve had very different experiences to that in the UK prior to the allergen laws

Some posters used the EU frame to challenge the position of both the original article and the 100 chefs. The author of the initial article was re-positioned as having the hidden agenda of stirring up EU negativity, proposing that the chefs were used in some way to promote a political agenda - two Twitter claimants stated:

Here's the organisation backing these silly chefs #100Chefs [link included]

Slightly embarrassing for these #100Chefs to be used by this anti-EU organisation

It was only Twitter users and individuals posting online comments on the original article who picked up on the political nature of the original article either supporting or contesting it. The two later newspaper articles did not make reference to this, rather locating the discussion in relation to the responsibility of food businesses to support those with an allergy or intolerance to avoid unpleasant medical consequences.

### ***A financial matter***

In relation to implementing the legislation several claimants emphasised the financial implications for businesses in making adjustments for allergen information provision, such as administration and auditing hours, extra print, staff training, and allergen-free alternative ingredients (although the provision of alternatives are not required by the legislation and indeed it is not a requirement of the legislation that written information is provided – this information can also be provided orally by restaurant staff). They stated that adopting the legislation (e.g. menu checking/alterations, and staff training) would generate costs, and if businesses felt their financial security is at risk they might be more likely to support arguments that are critical to the new regulations. The original news article emphasised some of the potential financial concerns:



They must display information ... or face fines of up to £5,000 for any infraction of the rules

Matthew Elliot in the original article also highlighted the potential damage to small independent businesses:

this has unfairly placed too great a burden on the catering industry which will hurt customers, and in particular small independent businesses.

Posters also linked issues of time and ease with the financial implications involved; many commenters stressed the ease (in their opinion) that auditing dish ingredients would be:

How long would it take to jot down the ingredients on some paper? Surely good chefs know about ingredients better than most too (Commenter on the original article)

Some commenters observed that while complying might involve some investment of time this would save time in the future as one commenter on the original article wrote:

Surely drawing up allergen info during a few hours at work would save staff being constantly hassled by allergic diners like me?

The original news article positioned chefs as individuals at financial risk, especially when referring to smaller businesses, noting the issues related to time, staff training, or providing new dishes (even if this is not a requirement according to the regulations). Some supporters of the legislation also questioned the chefs exposure to financial risk implying that if this was the case then it reflected their inflexibility and possible incompetence. Most commenters saw the listing/auditing process as simple and relatively straight forward. Others stressed the beneficial implications of providing allergen information, by tapping into a growing and lucrative 'free-from' market highlighting the negative implications of not catering for those with a food allergy or intolerance:

the gluten free market is estimated to be worth £1.6 billion in the UK (Commenter on the original article)

[chefs would be] alienating a big market of consumers who will mistrust for a long time! #AllergyHour (Twitter user)

Such quotes illustrate the ways in which those with allergies/intolerances to some foods challenged the idea that they were a costly population to cater for; they were repositioning themselves as an untapped source of income and customers, noting that more allergic/intolerant consumers might choose to eat out at an allergen-information friendly restaurant, when originally they may have chosen to avoid eating out at all.

## **Discussion**

From our analysis of online traditional and social media coverage of the debate triggered by the letter from 100 chefs we identified five main frames that claimants and commenters used. These were frames based on: the medical nature of food allergy/intolerance, consumer and business responsibility, fairness in catering/access, the politics of Europe, and the financial implications of the legislation. These frames were variously deployed with commenters positioning themselves and others to establish, support, resist, ignore or subvert them.

### ***Positioning and Repositioning***

The medical frame was deployed by numerous allergic or intolerant claimants as a way of positioning themselves and their allergy/intolerance as something medically diagnosed, legitimate and important. Those claiming identities as food allergic or intolerant presented their risk management practices when eating out as needing the cooperation of food businesses.

The lack of such cooperation and support was depicted as leading to at best, unpleasant and at worst, serious, medical consequences and experiences. Overall it was not the case that the medical frame was resisted or directly undermined by other commenters, rather it seemed that the medical frame was established in response to its absence in the initial 100 chefs article. In line with Harré et al. (2009) we saw some evidence of claimants opposing the allergen regulations negatively positioning the opposition, attempting to re-position intolerant individuals especially as ‘picky eaters’. There was also evidence in the comments of those deploying the medical frame, that they positioned some who avoided allergens as fussy eaters and not as having a real allergy. They sought to distance themselves from such reasons for avoiding allergens, positioning themselves as having a real allergies or food intolerance with serious medical consequences.

The dual consumer and business responsibility frame exemplified the focus on rights and duties outlined by Positioning Theory (Harré & Moghaddam, 2011). We found that claimants positioned themselves as having certain rights/duties and challenging the rights/duties of others. The pro-chefs position focused on their right to be creative and spontaneous in the kitchen, but were re-positioned/challenged as having an inability to be creative with ingredients that did not contain allergens. Similarly, allergic and intolerant individuals positioned themselves as having the right to disregard the chefs’ standpoint on the issue due to the legal obligations of the allergen rules and to the necessity – and right – to be able to avoid risk and manage their food allergy or intolerance. The rights and duties concept was also clearly illustrated through the frame associated with fairness. Allergic/intolerant claimants often stated that they have a right to a dining experience similar to those who do not have allergies/intolerances. They wanted to have choices when eating out and did not want to have to make a fuss. Thus food businesses were represented as having an obligation to allow all customers opportunities to eat in their food venues. In line with previous findings relating

to embarrassment often involved in trying to obtain allergen information (Leftwich et al., 2011) easier availability of information was represented as reducing the need for unnecessary risk taking.

In the EU frame, the author of the original 100 chefs article was re-positioned as having a hidden agenda of stirring up negativity towards the EU. The chefs focus on the legislation and misunderstandings associated with it (e.g. suggesting chefs would need to provide allergen-free dishes, as opposed to simply stating if allergens were present), enabled pro-legislation claimants to challenge the ‘top’ description of the chefs. Posters who supported the legislation challenge the representation of the legislation as involving major costs, for example in auditing allergens in dishes and possibly providing allergen-free alternatives. In their posts, allergic/intolerant claimants attempted to redress the cost balance by presenting themselves as a major untapped source of custom.

### ***Group processes and context variations***

When we examined the hashtags used during the 100 chefs incident, we found that reference points changed and developed during the debate. Initially one Twitter user used the hashtag #100CluelessChefs and this was picked up by several allergen-concerned Twitter users. However, following critical comments relating to the fairness of the hashtag (that it prevented those supporting the chefs from contributing) Twitter users shifted to a new hashtag #100Chefs. This was a visible example of ‘self-moderation’ and was evidence of the ways in which some commenters wanted to develop a constructive dialogue.

The nature of the Twitter platform with its limited character capacity of 140 characters meant that Tweepers were unable to refer to multiple concerns when posting a comment or building their argument. This was clear when tweets were compared to other online comments that did not have a word-limit. However, word restriction on Twitter does not render debate impossible. The #AllergyHour hashtag Twitter discussions involved an organised flow of

conversation which appeared to be the product of a familiar group setting, populated by like-minded individuals with group ground-rules and expectations. The #AllergyHour discussion around the 100 chef issue moved from initially addressing the financial and political issues considered in the original Telegraph article, to a reflection on potential blame, the medically dangerous nature of allergies/intolerances, just before contemplating responsibility, and what solutions there could be. This flow of discussion reflected Entman's (1993) observations of the functions of framing; to define issues, causes and make judgements and remedy suggestions.

The multitude of tweets in a small space of time utilising #AllergyHour across the data collection period (compared to other mentions and hashtags) alludes to formation of group membership, which appears to have led to a greater motivation to contribute (see Flanagin et al., 2013; Ling et al., 2005). Potentially, many of the allergen-concerned Twitter users were willing to leave their debate contributions for the allocated time that Allergy Hour meets. This possibility also links with the idea of allergic/intolerant individuals considering the ramifications of being attributed with an allergic/intolerant identity (Barnett & Vasileiou, 2014) and the 'imagined audience' online (Marwick & Boyd, 2011). Those participating in Allergy Hour might have felt they had a better idea of the audience receiving their contributions to the discussion, than did posters on more broad/open and less time-dependent hashtag like #14Allergens. Related to this, the effects of group identity and imagined audience may help explain the low level of contributions on Twitter from claimants sympathising with the chefs' argument. Several pro-legislation claimants (who claim to be allergic/intolerant, or a parent of an allergic/intolerant child) made detailed arguments in early posting perhaps stimulating the development of tentative group identity/position (in addition to a more pro-legislation audience) and placing pro-legislation claimants into the in-group. Research specific to those with food allergies has shown that within the mass media it is increasingly the case that

sufferers are taking charge in discussions (Harrington, Elliot & Clarke, 2012). Readers sympathising with the chefs' argument may have been less inclined to join the Twitter conversation.

## **Conclusion**

In this article we have drawn on data from a qualitative study that explored how claimants positioned themselves around the frames used in a debate triggered by a letter from chefs resisting the responsibilities EU food allergen legislation had conferred on them. We have shown how those engaged in managing the risks of having a food allergy/intolerance presented alternative ways of framing the debate and of positioning themselves and others within this in support of their risk management practices. Although the allergen legislation was intended to enable safe and confident choices for those seeking to avoid allergens, the ensuing debate on social media required them to justify their rights and the responsibilities of others. Engagement with social media has provided a useful setting for identifying and considering debates that span the role of individuals in the management of their health risks, through to claims and disclaimers about the role of other individuals or organisations in supporting this venture. Whilst not without methodological challenges, this provides encouragement for the insights that the analysis of social media can provide about the location and nature of responsibility, or the lack of it, for managing health risks.

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## Appendix

### Frame matrix for the 100 chefs incident

Frame	Definition	Origin	Reasoning/Outcome	Vocabulary	Examples
Medicalisation	Users emphasise the medically diagnosed nature of a food allergy or food intolerance.	Users commenting on the original Telegraph (A1) article to emphasise the importance of the legislation in saving lives.	Legislation supporters feel need to reiterate that the legislation is there for a reason.  Therefore hopefully more people will take the legislation seriously.	Reaction, anaphylaxis, disease, serious	‘There isn’t a cure’ (A2)  ‘... we cannot take risks, we are talking about lives here, not fads’ (COM)  <i>‘I wish they’d witnessed a full-blown ana reaction #AllergyHour’</i>  <i>‘If you’ve been in hospital with a child due to a reaction from eating in a restaurant it’s hard to listen to chefs saying this’ [Users dataset]</i>
Responsibility	Users emphasise how responsibly might lie with various parties e.g., the allergic/intolerance individual, food venues and businesses, or those supporting businesses.	Users who perhaps agree with the 100 chefs take on difficulties with the administration associated with the legislation.  Users who believe it is important to ask even if provided or present – for safety.  Those who believe food venues etc. should be providing information.	Those who are perhaps anti-legislation feel that those who have allergies/intolerances need to ask and check with chefs (perhaps in advance) rather than expect to be catered for.  Those who are providing a service to paying customers should be responsible in providing all info regarding allergen in dishes.  If written in law businesses should abide. Businesses should feel they can provide information so consumers can make the right choices.	Responsibility of the “allergee”, ask  Easy [to stick to regs], simple, outdated, duty	‘... in my view is the responsibility of the allergee to ask, not restaurants to list’ (Miers, A1).  ‘it is up to me to ask about allergens, but there’s no point asking if I can’t be given a clear answer’ (COM ).  ‘... the attitude of Britain’s top chefs is looking pretty outdated and churlish’ (A3).  <i>‘consumers need to give info and businesses need to care enough to find out for them! #AllergyHour’</i>

Fairness of Access	Emphasising the need for fairness in making food venues as safe as possible for anyone to eat out. Allergic/intolerant should be treated the same as all customers.	A2 and A3 article emphasise a lot.	Claimants here emphasise that all customers should be able to eat out safely. Allergic and intolerant consumers shouldn't be made to feel any different to regular diners. They should be able to eat out, or at least know what they can/can't eat, at any venue they visit.	Everyone, everybody else, rights	<p>'[chefs] should be leading the way in making it easier for everyone to enjoy good food' (A3).</p> <p><i>'all cases need to be taken seriously; it's not their job to judge #AllergyHour'</i></p> <p>'that's a breach of my rights' (COM)</p>
The Politics of Europe	<p>Users framing the issue as a political one. Seeing the legislation as an unnecessary European push for power.</p> <p>Users seeing commentaries framed as anti or pro EU.</p>	<p>Twitter comments allude to this.</p> <p>Comments under A1 very much about this issue too.</p>	<p>Anti-EU claimants emphasise that the EU should not be imposing regulations on UK businesses.</p> <p>Those businesses who sympathise with this view may feel their rights (e.g., as creative or spontaneous food providers) are being taken away.</p>	EU claptrap, attack, harming, nanny state	<p>'Brussels using a regulatory sledgehammer to crack a nut' (A1)</p> <p>'Science in the West is corrupted by big business and politics' (COM).</p> <p><i>'So it's some anti-EU organisation. Bit embarrassing for the #100chefs to be used like this really'</i></p> <p><i>'Today, I've been eating creative British food, which hasn't conformed to any nice safe EU clap-trap! #14Allergens #100Chefs'</i></p>
A Financial Matter	Commentators emphasise the financial implications for businesses having to adhere to the legislation – admin hours, extra print, staff training, and allergen-free alternatives.	<p>A1 makes this a key concern (e.g., effecting small businesses).</p> <p>Comments on A1 also sometimes support this frame of reference.</p>	<p>Businesses that perhaps assume they have to provide allergen-free meals may feel this poses a financial concern (e.g., more expensive ingredients).</p> <p>Adopting the legislation generally (e.g., menu alterations, and staff training) may incur costs.</p> <p>If businesses feel their financial security is at risk they may be more likely to support anti-legislation arguments.</p>	Small businesses, independent businesses	<p>'Costly overreaction' (A1)</p> <p>'... this has unfairly placed too great a burden on the catering industry ... in particular small independent businesses' (Elliot – from Business for Britain, A1).</p> <p><i>'they're alienating a big market of consumers who will mistrust for a long time! #AllergyHour'</i></p> <p><i>'But we'll eating out more, spending more, and trying new places since intro of regs. So more money for chefs!' [Users dataset].</i></p>

**Key:** A1 = original 100 chefs article; A2 = subsequent article 1 responding to original article; A3 = subsequent article 2; COM = comments following the original article online; [Italicised] = from tweet

## Figures

Source	Duration															
A 1																
A 1 Comments																
A 2																
A 3																
#100CheflessChefs																
#100Chefs																*
#AllergyHour																
#14Allergens																*
Users																*
	Day 1		Day 2		Day 3		Day 4		Day 5		Day 6		Day 7		Day 8	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
	9th March		10th March		11th March		12th March		13th March		14th March		15th March		16th March	
	Mon		Tue		Wed		Thu		Fri		Sat		Sun		Mon	

Note: All tweet values exclude retweets; \* = data collection terminated here

Figure 1. Overview of sources and their duration/occurrence throughout the 100 chefs incident.